

1 BOIES, SCHILLER & FLEXNER LLP  
2 RICHARD J. POCKER (NV Bar No. 3568)  
3 300 South Fourth Street, Suite 800  
Las Vegas, NV 89101  
4 TELEPHONE: (702) 382-7300  
FACSIMILE: (702) 382-2755  
rpocker@bsfllp.com

5 BOIES, SCHILLER & FLEXNER LLP  
STEVEN C. HOLTZMAN (*pro hac vice*)  
6 FRED NORTON (*pro hac vice*)  
KIERAN P. RINGGENBERG (*pro hac vice*)  
7 1999 Harrison Street, Suite 900  
Oakland, CA 94612  
8 TELEPHONE: (510) 874-1000  
FACSIMILE: (510) 874-1460  
9 sholtzman@bsfllp.com  
fnorton@bsfllp.com  
10 kringgenberg@bsfllp.com

11 Attorneys for Plaintiffs  
12 Oracle USA, Inc., Oracle America, Inc., and  
Oracle International Corp.  
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UNITED STATES DISTRICT COURT

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DISTRICT OF NEVADA

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18 ORACLE USA, INC., a Colorado corporation;  
19 ORACLE AMERICA, INC., A Delaware  
corporation; and ORACLE INTERNATIONAL  
20 CORPORATION, a California corporation,

21 Plaintiffs,

v.

22 RIMINI STREET, INC., a Nevada corporation;  
23 AND SETH RAVIN, an individual,

24 Defendants.

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BINGHAM MCCUTCHEN LLP  
GEOFFREY M. HOWARD (*pro hac vice*)  
THOMAS S. HIXSON (*pro hac vice*)  
KRISTEN A. PALUMBO (*pro hac vice*)  
BREE HANN (*pro hac vice*)  
THREE EMBARCADERO CENTER  
SAN FRANCISCO, CA 94111-4067  
Telephone: 415.393.2000  
Facsimile: 415.393.2286  
geoff.howard@bingham.com  
thomas.hixson@bingham.com  
kristen.palumbo@bingham.com  
bree.hann@bingham.com

DORIAN DALEY (*pro hac vice*)  
DEBORAH K. MILLER (*pro hac vice*)  
JAMES C. MAROULIS (*pro hac vice*)  
ORACLE CORPORATION  
500 Oracle Parkway  
M/S 5op7  
Redwood City, CA 94070  
Telephone: 650.506.4846  
Facsimile: 650.506.7114  
dorian.daley@oracle.com  
deborah.miller@oracle.com  
jim.maroulis@oracle.com

Case No. 2:10-cv-00106-LRH-PAL

**DECLARATION OF BREE HANN IN  
SUPPORT OF THE PARTIES'  
JOINT CASE MANAGEMENT  
CONFERENCE STATEMENT**

1 I, Bree Hann, declare as follows:

2 1. I am a member of the State Bar of California, and a partner at Bingham  
3 McCutchen LLP, counsel of record for Plaintiffs Oracle USA, Inc., Oracle America, Inc., and  
4 Oracle International Corporation (collectively, “Oracle”) in this action. I have personal  
5 knowledge of the matters stated herein and could and would testify competently about them if  
6 called upon to do so.

7 2. Defendant Rimini Street, Inc. (“Rimini”) served the interrogatories on which it  
8 now moves to compel on June 11, 2010 and October 3, 2011. Oracle timely responded on July  
9 21, 2010 and November 21, 2011, with supplemental responses on December 9, 2010, December  
10 15, 2011, and December 19, 2011. The latter two supplements were not in response to any  
11 complaint from Rimini.

12 3. I am informed that from the time Oracle served its responses to Rimini’s  
13 Interrogatory Nos. 11, 17-20, 25, 27, 30, 32 and 35-37 until December 6, 2011, Rimini never  
14 complained to Oracle about these interrogatory responses, and never asked Oracle to meet and  
15 confer about them.

16 4. Attached as **Exhibit A** is a true and correct copy of Rimini’s second Rule 30(b)(6)  
17 notice to Oracle (the “Second Notice”), served on September 28, 2011. It includes 61 topics.

18 5. On October 11, 2011, Oracle objected to the Second Notice and requested that  
19 Rimini meet and confer on the topics. Attached as **Exhibit B** is a true and correct copy of an  
20 October 11, 2011 letter from Thomas S. Hixson, counsel for Oracle, to Robert H. Reckers,  
21 counsel for Defendants, setting out Oracle’s objections and meet and confer request.

22 6. Attached as **Exhibit C** is a true and correct copy of Rimini’s third Rule 30(b)(6)  
23 notice to Oracle (the “Third Notice”), served on November 4, 2011. It includes 22 topics.

24 7. Attached as **Exhibit D** is a true and correct copy of a November 17, 2011 letter  
25 from Mr. Hixson to Mr. Reckers.

26 8. Attached as **Exhibit E** is a true and correct copy of a December 6, 2011 letter  
27 from Mr. Reckers to Mr. Hixson.

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1           9.       On December 22, 2011, I participated in a telephonic meet and confer with Kieran  
2 Ringgenberg, co-counsel for Oracle, and Mr. Reckers, Michelle Marriott, and Megan Redmond,  
3 counsel for Defendants. During that meet and confer, Ms. Marriott and Ms. Redmond reiterated  
4 Rimini's December 6 suggestion that Oracle could supplement certain interrogatory responses  
5 rather than provide a Rule 30(b)(6) witness on certain topics.

6           10.      Attached as **Exhibit F** is a true and correct copy of pages 34 through 37 of the  
7 transcript of the Status Conference held in this action on November 8, 2011.

8           11.      In the eighteen months prior to December 6, 2011 (the fact discovery cutoff),  
9 Rimini took the depositions of eight Oracle witnesses: Buffy Ransom on April 21, 2011; John  
10 Marandola on May 12, 2011; David Renshaw on May 26, 2011; Sean Fitzpatrick on June 17,  
11 2011; Rick Cummins on July 13, 2011; Jason Taylor on July 20, 2011; Richard Foster on August  
12 4, 2011; and Robbin Henslee on August 24, 2011. After the discovery cutoff, Rimini deposed  
13 Charles Phillips on December 9, 2011, Richard Allison on December 20, 2011, Safra Catz on  
14 December 14, 2011, and Juan Jones on January 5, 2012.

15          12.      Attached as **Exhibit G** is a true and correct copy of a December 23, 2011 email  
16 from Ms. Marriott to me, copying other counsel in this action.

17          13.      Attached as **Exhibit H** is a compilation of the interrogatories on which Rimini  
18 moves to compel, including Oracle's most recent response to each.

19          14.      Attached as **Exhibit I** is a true and correct copy of pages 162-169 of the  
20 Deposition of Richard Allison, taken on December 20, 2011, with certain irrelevant portions  
21 redacted.

22          15.      Attached as **Exhibit J** is a true and correct copy of Defendant Rimini Street,  
23 Inc.'s Fifth Set of Interrogatories to Plaintiffs, served on October 3, 2011.

24          16.      Attached as **Exhibit K** is a true and correct copy of Plaintiffs Oracle USA, Inc.,  
25 Oracle America, Inc., and Oracle International Corporation's Fifth Set of Interrogatories to  
26 Defendant Rimini Street, Inc., served on May 25, 2011.

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1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct, and that this Declaration was signed on January 6, 2012, in San  
3 Francisco, California.

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5 \_\_\_\_\_ /s/ Bree Hann

6 Bree Hann

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